

KELLNER HERLIHY GETTY & FRIEDMAN, LLP

470 PARK AVENUE SOUTH, 7th FLOOR  
NEW YORK, NEW YORK 10016

DOUGLAS A. KELLNER  
CAROL ANNE HERLIHY  
EUGENE F. GETTY  
ALAN M. FRIEDMAN  
JEANNE-MARIE WILLIAMS  
THOMAS VANDENABEELE  
CHARLES E. KRAUSCHE II  
OLGA V. PETROVSKY

DERRICK M. NG  
DMITRIY BOGORODSKIY<sup>φ</sup>  
MICHELLE D. BAZINET  
JAEMYUNG JAE LEE  
MERIELLEN DAL RI ZIVIANI<sup>\*</sup>  
LOUISE GRÉGOIRE  
EDI EBIEFUNG  
BRENDAN SULLIVAN

TELEPHONE: (212) 889-2121  
FACSIMILE: (212) 684-6224  
dak@khgflaw.com

COUNSEL  
MICHAEL H. SINGER  
ROBERT P. MCGREEVY  
HERMAN D. FARRELL III

<sup>φ</sup> Qualified in the Russian Federation  
<sup>\*</sup> Admitted in Brazil

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By email: Tara.McGrath@usdoj.gov

Tara McGrath, Esq.  
Assistant United States Attorney  
Eastern District of New York  
271A Cadman Plaza East  
Brooklyn, New York 11201

*United States v. Shares of 21 East 61st Street Apartment Corp. et al.*  
Civil Docket No. 24-2147

Dear Ms. McGrath:

We write as counsel to claimants Lovitas, Inc., Baloas, Inc. and Dr. Hak Seon Kim (the "Claimants"). In accordance with the Court's Individual Practice Rules, Claimants are serving their Motion to Dismiss. The motion papers consist of the following:

- Claimants' Notice of Motion to Dismiss the Complaint;
- Claimants' Memorandum of Law in Support of their Motion to Dismiss;
- Declaration of Douglas Kellner with accompanying exhibits;
- Declaration of Sunny Hathiramani with accompanying exhibits;
- Declaration of Mergen Baasandorj.

Yours truly,

Douglas A. Kellner  
Attorneys for Claimants

Copies to: All Counsel of Record (via CM-ECF)